

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

Ted D. Ellis and Teresa Ellis,)	
)	
Plaintiffs,)	
)	
v.)	C/A No.: 9:19-cv-2163-RMG-MGB
)	
Cody C. Kirkman, individually; Amber)	
Swinehammer, individually; Lindsey)	PLAINTIFF'S DESIGNATION OF
Gibson, individually; Cody C. Kirkman,)	EXPERT WITNESSES
Amber Swinehammer, and Lindsey)	
Gibson, as agents/officers of Town of)	
Bluffton Police Department; and Town)	
Of Bluffton Police Department)	
)	
Defendants.)	
_____)	

Pursuant to Federal Rule of Civil Procedure 26(a)(2)(A), Plaintiffs Ted D. Ellis and Teresa Ellis, notifies all interested parties that they may present expert testimony at trial in this action from the following expert and treating medical professionals:

Professor Seth Stoughton
Associate Professor of Law
School of Law
University of South Carolina
1525 Senate Street
Room 325
Columbia, SC 29208

Professor Stoughton will testify as to his expert opinion of the propriety of the use of force used by law enforcement in this incident as well the lack of proper supervision and training that directly led to the improper use of force.

Dr. Adam Squicquero
Howard Family Dental Pinckney Colony
10 Pinckney Colony Road Suite 503
Bluffton, Sc 29909

Dr. Squicquero will testify as to the injuries suffered by Plaintiff Ted Ellis as a result of the subject incident, the dental treatment rendered as a result of those injuries, and his observations of the distress and suffering caused to Mr. Ellis during his encounters with him. Dr. Rami will base his testimony and opinions on his specialty in dentistry and reconstructive surgery.

Dr. Saied Khosrowpour
Coastal Carolina Medical Center
1000 Medical Center Dr
Hardeeville, SC 29927

Dr. Khosrowpour will testify as to the injuries suffered by Plaintiff Ted Ellis as a result of the subject incident, the medical treatment rendered as a result of those injuries, and his observations of the distress and suffering caused to Mr. Ellis during his encounters with him. Dr. Khosrowpour will base his testimony and opinions on his specialty in emergency medicine.

Kasie A. Moore NP
Coastal Carolina Medical Center
1000 Medical Center Dr
Hardeeville, SC 29927

Ms. Moore will testify as to the injuries suffered by Plaintiff Ted Ellis as a result of the subject incident, the medical treatment rendered as a result of those injuries, and her observations of the distress and suffering caused to Mr. Ellis during his encounters with him. Ms. Moore will base her testimony and opinions on her specialty in emergency medicine.

Amber Williamson, RN
Coastal Carolina Medical Center
1000 Medical Center Dr
Hardeeville, SC 29927

Ms. Williamson will testify as to the injuries suffered by Plaintiff Ted Ellis as a result of the subject incident, the medical treatment rendered as a result of those injuries, and her observations of the distress and suffering caused to Mr. Ellis during his encounters with him.

Dr. Paul Zorch
Coastal Carolina Medical Center
1000 Medical Center Dr
Hardeeville, SC 29927

Dr. Zorch will testify as to the injuries suffered by Plaintiff Ted Ellis as a result of the subject incident, the medical treatment rendered as a result of those injuries, and his observations of the distress and suffering caused to Mr. Ellis during his encounters with him. Dr. Zorch will base his testimony and opinions on his specialty in family medicine.

This is to certify that written reports of the expert witness and treatment from the health care professionals listed above regarding Plaintiffs have been provided to opposing counsel. This disclosure is made to notify all interested parties and counsel that Plaintiffs intend to offer factual and expert testimony from Professor Stoughton and all of Ted Ellis's medical treatment providers regarding injuries diagnosed, causation of same, treatment for same, prognosis of same and all other particulars set forth in his medical records. Plaintiffs reserve the right to supplement this response upon receipt of additional information as discovery continues.

Respectfully submitted,

s/ Arie D. Bax
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ATTORNEY FOR THE PLAINTIFFS

April 27, 2020